



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

May 30, 2008

Nancy Wrona, Director
Air Quality Division
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, AZ 85007

Dennis Smith, Executive Director
Maricopa Association of Governments
302 North 1st Avenue, Suite 300
Phoenix, AZ 85003

RE: Adequacy Status of Motor Vehicle Emissions Budget in
the *MAG Five Percent Plan for PM-10 for the Maricopa
County Nonattainment Area* (December 2007)

Dear Ms. Wrona and Mr. Smith:

We have found adequate for transportation conformity purposes the motor vehicle emissions budget in the Maricopa Association of Governments (MAG) *MAG Five Percent Plan for PM-10 for the Maricopa County Nonattainment Area* (December 2007) ("2007 MAG 5% Plan"). As a result of our adequacy finding, MAG and the U.S. Department of Transportation must use this budget in future conformity analyses once the finding becomes effective.

By letter dated December 21, 2007, the Arizona Department of Environmental Quality (ADEQ) submitted the 2007 MAG 5% Plan to EPA as a revision to the Arizona State Implementation Plan (SIP). The plan identifies the regional motor vehicle emissions budget (calculated for an annual average day in 2010) in the table below:

MOTOR VEHICLE EMISSIONS BUDGET (metric tons per day, mtpd)	
Budget Year	PM-10 (mtpd)
2010	103.3

On March 13, 2008, we announced receipt of the 2007 MAG 5% Plan on the Internet and requested public comment on the adequacy of the motor vehicle emissions budget by April 14, 2008. We did not receive any comments during the comment period.

This letter transmits our decision that the motor vehicle emissions budget contained in the 2007 MAG 5% Plan is adequate for transportation conformity decisions. After reviewing the 2007 MAG 5% Plan, including responses to public comments on that plan, we have preliminarily determined that it demonstrates not less than 5% annual PM-10 emissions reductions and demonstrates attainment of the PM-10 standard in the Phoenix metropolitan nonattainment area. We have detailed our adequacy findings in the enclosure. A copy of this letter and its enclosure will soon be posted on the Internet at <http://www.epa.gov/otaq/stateresources/transconf/adequacy.htm>. We will also announce the adequacy finding in the Federal Register. The finding will become effective 15 days after the Federal Register announcement.

If you have any questions regarding this adequacy finding, please contact Colleen McKaughan at (520) 498-0118 or Wienke Tax at (520) 622-1622.

Sincerely,



Deborah Jordan
Director, Air Division

Enclosure

cc: Bob O'Loughlin, FHWA
Ed Stillings, FHWA
Leslie Rogers, FTA
Beverly Chenausky, ADOT
Lindy Bauer, MAG
Diane Arnst, ADEQ

Enclosure

**Transportation Conformity Adequacy Review
Five Percent Plan**

Adopted by MAG on December 19, 2007, Adopted by ADEQ on December 21, 2007, Submitted by
ADEQ on December 21, 2007

Adequacy Review Criteria (40 CFR part 93)		Is Criterion Satisfied?	Reference in SIP document/comments
Sec. 93.118(e)(4)(i)	The plan was endorsed by the Governor (or designee) and was subject to a public hearing by the State.	Y	As documented in the transmittal letter dated December 21, 2007 from Stephen A. Owens, Director, ADEQ, to Wayne Nastri, Regional Administrator, EPA Region IX, the 2007 MAG 5% Plan has been adopted as a revision to the Arizona SIP pursuant to Arizona law. Appendices, Volume 5, Appendix D, Exhibit 1 of the plan contains documentation of joint public hearing held by ADEQ and MAG on December 12, 2007.
Sec. 93.118(e)(4)(ii)	The plan was developed through consultation with federal, state and local agencies; full implementation plan documentation was provided to EPA and EPA's stated concerns, if any, were addressed.	Y	Documentation accompanying the plan describes a public and agency outreach effort. The development of the plan was discussed by the interagency Air Quality Planning Team (MAG, Maricopa County, ADEQ, ADOT) and the plan was reviewed by the MAG Air Quality Technical Advisory Committee (environmental managers of MAG member agencies, members of the public, representatives of environmental and business interests, and others), the MAG Management Committee (managers of MAG member agencies) and the MAG Regional Council (elected officials of MAG member agencies). See chapter 9 of the 2007 MAG 5% Plan. EPA received a copy of the draft plan and EPA's comments were largely addressed.
Sec. 93.118(e)(4)(iii)	The motor vehicle emissions budgets are	Y	The budget (i.e., 103.3 metric tons per day) is found on page 8-75 of the plan. As shown on page 8-75, the budget is derived by

	clearly identified and precisely quantified.		adding annual PM-10 emissions from construction (road), exhaust/tire wear/brake wear, travel on paved roads (including trackout), and travel on unpaved roads, and then dividing the sum by 365 days per year, and converting the resulting tons per day value to units of metric tons per day.
Sec. 93.118(c)(4)(iv)	The motor vehicle emissions budgets, when considered together with all other emission sources, are consistent with applicable requirements for reasonable further progress, attainment, or maintenance (whichever is relevant to the given plan).	Y	EPA has preliminarily concluded that the 2007 MAG 5% Plan demonstrates not less than 5% annual PM-10 emissions reductions and demonstrates attainment in the Phoenix metropolitan nonattainment area by 2010, and that the motor vehicle emissions budget is consistent with those demonstrations.
Sec. 93.118(c)(4)(v)	The plan shows a clear relationship between the emissions budgets, control measures and the total emissions inventory.	Y	The 2005 periodic emissions inventory for all point, area, and mobile sources is described on pages 3-2 and 3-5 and presented in graphical and tabular form on pages 3-3 and 3-4 of the plan. The full 2005 periodic emissions inventory is included as Appendix B, Exhibit 1 (contained in Volume 1 of the Appendices) of the plan. The control strategy is set forth in chapter 6 of the plan. Chapter 7 combines base case emissions projections (derived from the 2005 emissions inventory) with emissions reductions from committed control measures from the control strategy (described in chapter 6) to estimate future (controlled) emissions for 2008-2010. See tables 7-1 through 7-3 of the plan. Chapter 7 also includes a

			demonstration that the controlled emissions represent greater than 5% annual reduction in PM-10 from the base case. The motor vehicle emissions budget (shown on page 8-75) is derived from the controlled emissions inventory for 2010. Chapter 8 contains the attainment demonstration for the nonattainment area based on the results from different modeling analyses done for subareas in which PM-10 exceedances were recorded during the 2004-2006 period. The emissions inventories developed for each of the subareas modeled for the attainment demonstration rely on the same emissions factors and control measure effectiveness factors used to develop the area-wide emissions inventories and related motor vehicle emissions budget.
Sec. 93.118(e)(4)(vi)	Revisions to previously submitted control strategy or maintenance plans explain and document any changes to any previous submitted budgets and control measures; impacts on point and area source emissions; any changes to established safety margins (see 93.101 for definition), and reasons for the changes (including the basis for any changes to emission	Y	The budget submitted in the Revised MAG 1999 Serious Area Particulate Plan for PM-10 in the Maricopa County Nonattainment Area was approved. See 67 FR 48718, July 25, 2002. The budget found adequate in this action does not constitute a revision to the previously approved budget in the Revised 1999 Plan since that plan was written for a different time period.

	factors or estimates of vehicle miles traveled).		
Sec. 93.118(e)(5)	EPA has reviewed the State's compilation of public comments and response to comments that are required to be submitted with any implementation plan.	Y	MAG compiled public comments submitted during the joint MAG –ADEQ public hearing held on December 12, 2007 and during the public comment period. These comments and the responses are included in Appendices, Volume 5, Appendix D, Exhibit 1 of the plan. We have reviewed the compilation of comments and responses and find MAG's responses to be acceptable. No issues that might have affected our adequacy finding remain unanswered.
Reviewer: Wienke Tax			Date of Review: May 20, 2008